

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

|   |   |
|---|---|
| <b>IN RE: ETHICON, INC. PELVIC REPAIR<br/>SYSTEM PRODUCTS LIABILITY<br/>LITIGATION</b>                      | <b>Master File No. 2:12-MD-02327<br/>MDL No. 2327</b> |
| <b>THIS DOCUMENT RELATES TO:</b><br><br><b>ALL PLAINTIFFS LISTED IN EXHIBIT A<br/>TO PLAINTIFFS' MOTION</b> | <b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b>      |

**ETHICON'S NOTICE OF ADOPTION OF PRIOR OPPOSITION TO PLAINTIFFS'  
MOTION TO EXCLUDE OR OTHERWISE LIMIT THE OPINIONS AND TESTIMONY  
OF SCOTT SERELS, M.D.**

Come now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Scott Serels, M.D., for Ethicon Wave 1, Dkt. [2226]. The Court previously overruled most of Plaintiffs' objects to Dr. Serels's testimony, Dkt. [2689]. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing and as adopted by this Court in its prior ruling.

Respectfully submitted,

ETHICON, INC., ETHICON LLC, AND  
JOHNSON & JOHNSON

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)  
Thomas Combs & Spann, PLLC  
300 Summers Street, Suite 1380  
P.O. Box 3824  
Charleston, WV 25558-3824  
(304) 414-1800

/s/ Christy D. Jones

Christy D. Jones  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4523

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

Christy D. Jones

ButlerSnow 31041577v1  
36344757.v1